

# **EXHIBIT A**

Janet Hudnall

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IN THE DISTRICT COURT  
DISTRICT OF NEVADA

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KEVIN PHILLIPS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	3:12-cv-00344-
C.R. BARD, INC., et al,	)	RCJ-WGC
	)	
Defendants.	)	
	)	

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FRIDAY, NOVEMBER 1, 2013

DEPOSITION OF JANET HUDNALL

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REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

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1           A.    I -- I don't really know what the timing  
2    was.   So I don't recall.

3           Q.    But is there any question in your mind  
4    that Recovery was removed from the market because  
5    now the company had a G2 to market?

6           A.    Because it's the next generation Recovery  
7    device, yes.

8           Q.    Okay.   Whatever -- whatever the reason,  
9    Recovery removed from the market because now we got  
10   the G2?

11          A.    Recovery discontinued because G2 was now  
12   available.

13          Q.    Did you ever receive any data during the  
14   entire time that the Recovery was on the market  
15   which revealed any statistics about how many -- of  
16   how many patients were saved from a pulmonary  
17   embolism going to their heart by having a Recovery  
18   filter in them, any statistics?

19          A.    That's theoretically the same number of  
20   units that -- that were implanted.

21          Q.    Well, I know, but not -- not everyone who  
22   gets one of those devices has a pulmonary embolism,  
23   right?

24          A.    And not everybody who has a pulmonary  
25   embolism gets documented.